

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:21-cr-00041-JL
	)	
IAN FREEMAN	)	

**MOTION TO STAY GOVERNMENT’S FILING DEADLINE**

On July 29, 2022, Counsel for Aria DiMezzo filed a motion to exclude forensic blockchain analysis. Counsel for Ian Freeman joined the motion later that day. The government subsequently clarified for defense counsel that it did not intend to introduce evidence relying on proprietary blockchain tracing tools and instead would rely on the proposed expert’s own blockchain analysis using open-source tools. The parties then agreed to allow defense counsel an opportunity to question the witness to determine whether they would still proceed with the motion and thus whether a hearing would be necessary. The parties also agreed that the government would delay responding to the motion until after that interview. The government regretfully forgot to inform the Court of the parties’ agreement with respect to the government’s filing deadline and to request an extension.

The interview of the defendant’s expert was scheduled for September 12, 2022. Defendant DiMezzo’s counsel planned to conduct the interview for both defendants. As defendant DiMezzo pled guilty that same day, counsel for defendant Freeman requested that the interview be postponed. Counsel for the government and counsel for defendant Freeman are attempting to determine whether defendant Freeman’s counsel will proceed with the interview at a later date or not. The government requests that the government’s filing deadline be stayed until counsel can confer about whether defendant Freeman wishes to pursue the motion and/or the interview of the expert. Assuming the Court grants this motion, the government will file an

update with the Court no later than September 28, 2022, requesting that the Court set a new deadline for the government's response to the motion.

Defendant Freeman, through counsel, assents to this motion.

Respectfully submitted,

JANE E. YOUNG  
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Dated: September 15, 2022

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